

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

XIAFEN “SHERRY” CHEN

Plaintiff,

Vs.

UNITED STATES OF AMERICA

Defendant.

Case No. 1:19-cv-00045

District Judge Timothy S. Black

Plaintiffs Unopposed Motion for a  
Three- Week Extension of Time to  
Answer, Move, or Otherwise Plead in  
Response to Defendant’s Motion To  
Dismiss

Plaintiff Xiafen Chen, moves this Honorable Court to extend the time to answer, move or otherwise plead in response to Defendant's Motion to Dismiss. In support, Plaintiff states as follows:

1. Pursuant to 7.3(a), Counsel for Plaintiff Xiafen Chen, solicited, conferred and received consent to the requested extension of time until June 7, 2019, 21 days from the original due date.
2. Opposing counsel, Matthew J. Horwitz and Kevin Koller concur with the request for the requested extension of time to June 7, 2019 and have no objections.
3. No prejudice will result to any party as a result of such time extension.
4. This is the first request for an extension by the Plaintiff.
5. This request is made solely in the interest of justice.

The proposed motion is attached.

Respectfully submitted,

/s/ Michele L. Young

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s/ Peter Toren

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